

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

VICTOR MEJIA RIOS, et al.,

Plaintiffs,

vs.

Case No.: 5:19-CV-00552 (XR)

THE GEO GROUP, INC.,

Defendant.

**PLAINTIFF'S AGREED MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTION TO DISMISS**

Plaintiffs, Victor Mejia Rios, *et al.*, in accordance with Local Rule AT-4(b) and FRCP 6(b)(1), hereby move for an extension of time, until September 13, 2019, to file their Response to the Defendant's Motion to Dismiss. Plaintiffs also consent to an extension of time for Defendant's to file their Reply.

1. Plaintiffs' response is currently due to be filed on August 14, 2019. Local Rule CV-7(f)(2). Defendant's reply would ordinarily be due seven days thereafter. Local Rule CV-7(f)(2).

2. This is Plaintiffs' first request for an extension of time to respond to Defendant's Motion to Dismiss.

3. On August 5 and 6, 2015, Plaintiffs' Counsel for Plaintiffs Victor Mejia Rios, *et al.*, Mr. Jule Rousseau, contacted by email, Counsel for the Defendant, The GEO Group, Mr. Charlie A. Deacon, who consented to an extension of 30 days until September 13, 2019, for

Plaintiffs to file their respond to the Defendant's Motion to Dismiss that was filed on July 30, 2019.

4. Defendant requested and Plaintiffs agree to an extension of 30 days for Defendant to file its Reply, which would ordinarily be due seven days after Plaintiffs have responded to Defendant's Motion to Dismiss. Defendant's Reply will now be due on Monday October 14, 2019.

5. Plaintiffs do not make this motion for purposes of delay. Rather, Plaintiffs request this additional time because Plaintiffs believe that this matter concerns numerous, novel claims raising important legal and policy issues, and additional time is needed to prepare pleadings.

6. The Court has not placed this matter on the trial docket, and no pretrial deadlines have been scheduled. The granting of the requested extension will not affect the trial or other deadlines in this matter.

Respectfully submitted,

/s/ Jule Rousseau

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2019, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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